

November 12, 2008

Mr. Don West
Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Ms. Deborah Orr
EPA Region V
7 West Jackson Boulevard
Chicago, IL 60604-3507

Dear Mr. West and Ms. Orr:

The City of Rockford is pleased to submit our application to the USEPA for a \$ 350,000 Site Specific Assessment Grant for the ___ acre South Main Rail yard area... This area is located immediately south of Downtown Rockford and contains numerous vacant and deteriorated structures and surplus land. This area forms a serious barrier to connecting Downtown with Barber Colman, one mile to the south of Downtown and one fourth mile west of the Rock River. In addition the neighborhoods to the south and west of the rail yard area show severe economic distress. With the assistance of USEPA and IEPA, the City has made major progress towards the redevelopment of the Barber Colman site. The Brownfields Programs have also assisted with two major developments in Downtown, the Winnebago County Justice Center and the Federal Courthouse under construction. The South Main Rail yard area, however, in its present state, is a serious detriment to the future success of Barber Colman and nearby areas.

Unfortunately our community has a disproportionately high number of Brownfield sites. Rockford has a strong history of manufacturing that included notables such as Ingersoll, Barber Coleman, J.I. Case, National Lock, Amerock and Sundstrand. These industries were at full production during the 1960's, but by the 1980's all of these manufacturers had either scaled back their operations or relocated their operations outside of Illinois. Rockford experienced 25% unemployment in 1982, the highest in the nation, as a result of these changes. This had a ripple effect that put many small manufacturers out of business leaving behind abandoned buildings especially in the oldest sections of the City, including current and former rail corridors. The South Main Rail yard area is where four rail lines converge and interconnect. Rail service has been present at this location since 1858 when the first rail line, currently the Union Pacific, crossed the Rock River on the south edge of Downtown and constructed a spur to serve Rockford's very first industrial area, the Water Power District., immediately east of the South Main Rail Yard area. Brownfield sites along rail corridors are often too limited in size to be easily assembled for redevelopment. The City of Rockford intends to assemble the surplus land in the South Main Rail Yard area as an important component of the implementation of the Rail Consolidation Study completed by Wilbur Smith and Associates in September of 2003 and approved by the Rockford City Council. The recommendations of this study include the provision of additional rail interconnections on the east side of the Rock River, the construction of a new rail switching yard on the east side of the Rock River and the reduction of rail bridge crossings of the Rock River from 3 to 2. Once these improvements are completed and the City has assembled the needed property in the South Main Rail Yard, the City proposes to bring neighborhood retail and general services into the area in the short term and Metra and Amtrak Service into this area in the longer term and redevelop a portion of this area with a mixed use Transit Oriented Development. An important component of this development is the Davis-Pec Path Connection, a major link in the Grand Illinois Trail System and an excellent opportunity to connect this area into the surrounding neighborhood

Applicant Identification: City of Rockford, 425 East State Street, Rockford, Illinois, 61104

Funding Requested: \$350,000 Site Specific Hazardous Substance Assessment Grant for the South Main Rail Yard Area.

Location: City of Rockford, Winnebago County, State of Illinois

Chief Executive: Mayor Lawrence J. Morrissey
425 East State Street, Rockford, Illinois 61104
P: 815.987.5590 F: 815. 967.6952
Email: jennifershelton@rockfordil.gov

Project Contacts: Wayne Dust, AICP, Planning Administrator
Department of Community and Economic Development
425 East State Street, Rockford, Illinois 61104
P: 815.987.5636 F: 815.967.6933
Email: wayne.dust@rockfordil.gov

Date Submitted: November 12, 2008

Project Period: October 2009 – September 2012

Population: 150,115 (2000 Census)

Other: The City of Rockford is a State designated Enterprise Zone, A State Designated River Edge Zone and a “Labor Surplus Municipality”

Cooperative Partners: Rockford Park District (Tim Dimke, 815.987.8800), including Tinker Swiss Cottage and Midway Village ; Rockford Local Development Corporation (John Phelps, 815.987.8675); River District Association (Kim Wheeler, 815.964-6221); Southwest Ideas for Today and Tomorrow (SWIFT) (, 815.965.3606); Comprehensive Community Solutions, Inc. (Kerry Knodle, 815.963.6236)

.Our rail corridors have a long industrial past that we now desire to redevelop into neighborhood commercial and recreational use areas. We have made great strides in the environmental assessment process at several nearby sites with Phase I and II ESAs, but because of Rockford’s huge inventory of Brownfields we are need of funding far beyond the Community-wide Assessment program to tackle this complex site while we continue assessment work at other Brownfield sites.

Very truly yours,

Lawrence J. Morrissey
Mayor, City of Rockford

Project Description

Threshold Criteria for Assessment Grants

A. Applicant Eligibility

Rockford is a municipal corporation formed by the authority of the State of Illinois. Rockford is eligible to apply for assessment grants from the USEPA.

B. Letter from the State or Tribal Environmental Authority

The Letter from the Illinois Environmental Protection Agency is attached in Attachment A.

C. Site Eligibility and Property Ownership Eligibility

Eligibility Determinations have been submitted for the 28 parcels comprising this site. USEPA Region 5 has determined these parcels to be eligible for a Hazardous Substance Assessment Grant.

a) Basic Site Information:

(a) Name of Site: South Main Rail Yards Site

(b) Address of the site: west side of South Main Street south from Cedar Street and the Union Pacific Railway on the north to Kent Creek on the south (601 through 839 South Main Street, inclusive), and extending west along the Kent Creek to the Winnebago Street Viaduct (a grade-separated crossing of the rail lines and yard) and north to Cedar Street.

(c) The twenty –eight parcels comprising this site are identified by property tax code pin number, address and owner as follows:

11-22-454-007	unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely
11-22-455-001	unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely
11-22-456-001	unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely
11-22-456-002	unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely
11-22-456-003	unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely
11-22-456-004	unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely
11-22-484-000	unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely
11-22-484-001	522 Cedar Street, Rockford Ill, 61101: AMCORE Bank, P.O. Box 1537, Rockford, Ill., 61110
11-22-484-002	502 Cedar Street, Rockford, Ill, 61101 Murphy Transfer, 500 S. Independence Ave, Rockford. Ill., 61102
11-22-484-003	5xx S. Winnebago Street, Rockford, Ill 61101; AMCORE Bank, P.O. Box 1537, Rockford, Ill., 61110
11-22-485-002	514 S. Church Street, Rockford, Ill. 61101; AMCORE Bank, P.O. Box 1537, Rockford, Ill. 61110

11-22-485-003 514 S. Church Street, Rockford, Ill, 61101; AMCORE Bank, P.O. Box 1537, Rockford, Ill. 61110

11-22-486-001 330 Cedar Street, Rockford, Ill 61101; James Holder, 978 Old Ralston Rd. Machesney Park, Ill., 61115

11-22-486-002 501 S. Main Street, Rockford, Ill. 61101; S. and L. Warshawski, 431 S. Main St. Rockford, Ill., 61101

11-22-488-001 511 S. Church St., Rockford, Ill 61101; MRC Communications, Inc. 13935 Bishop's Drive, Brookfield, Wisc. 53005

11-22-501-001 unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely

11-22-504-004 unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely

11-22-504-006 unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely

11-22-504-007 unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad Ownership is likely

11-27-210-001 unaddressed, Rockford, Ill, 61101; Unknown Owner, Railroad or Rockford Park District

11-27-226-009 615 S. Main Street Rockford, Ill 61101; I&M Rail Link LLC, P.O.Box 16630, Missoula, Montana, 59808

11-27-226-011 639 S. Main St., Rockford, Ill. 61101; Richard T. Shields, 639 S. Main St, Rockford, Ill. 61101

11-27-226-012 641 S. Main St. Rockford, Ill. 61101; David L. Ayres, 641 S. Main St. Rockford, Ill. 61101

11-27-503-001 unaddressed, Rockford, Ill, 61101 Unknown Owner, Railroad Ownership is likely

11-26-505-003 8xx South Main Street, Rockford, Ill. 61101; Canadian National Railway

11-27-229-009 700 S. Main Street, Rockford, Ill., 61101; W.A. Whitney Co. 650 Race St., Rockford, Ill. 61101

11-27-229-010 8xx S. Main St., Rockford, Ill., 61101; Unknown Owner, Railroad Ownership is likely

11-27-229-011 8xx S. Main St., Rockford, Ill., 61101 Unknown Owner, Railroad Ownership is likely

This 28 parcel site includes approximately 33 acres.

b. Status and History of Contamination of the Site:

(a) type of contamination: Suspected contamination is primarily with hazardous substances linked to foundry and manufacturing sites within this rail yard area and there may be some instances of petroleum comingling due to nearby underground storage tanks.

(b) operational history and current uses: This entire site was railroad owned ninety years ago. The northern section of this rail yard area had been railroad owned for another 60 years prior, starting in 1858 when the predecessor of the later the Chicago and Northwestern R.R., the Chicago, Galena and Union RR., bridged the Rock River and constructed tracks at the northern edge of the site. Ninety years ago the Chicago and Northwestern R.R. had a main line from Chicago to Freeport Illinois, and a passenger station, freight stations and sidings in the northern part of the Site. This line, currently owned by the Union Pacific R. R. is still in operation, but it only continues another mile west to Liebovich Steel.

In the central part of the Site, the Chicago Burlington and Quincy Railroad and Chicago Milwaukee St. Paul and Pacific Railroad had through lines, sidings and rail yards. These railroads connected north to

Janesville, Wisc. and South to Rochelle, Ill. And these routes are still intact, but with different operators today. There were passenger and freight stations on the west side of South Main Street for these two railroads and several manufacturing and foundry sites in the interior of this central area. All of these manufacturing and foundry sites are vacant and though some freight facilities still exist but are not used.

The southeast side of the Site had two manufacturing sites served by the Illinois Central RR through route from Chicago to Omaha, Nebraska which is located at the extreme south of the Site. This line, now owned by the Canadian National R.R. is still in operation and has several trains daily

(c) Environmental concerns; the main environmental concerns due to manufacturing and foundries previously located in certain areas of the site and general environmental concerns because of the long history of major rail road operations throughout the site.

(d) How the site became contaminated Suspected contamination is primarily with hazardous substances linked to foundry and manufacturing sites within this rail yard area due to common industrial practices during that time period. There may also be some instances of petroleum comingling due to nearby underground storage tanks, general rail operations and locomotive storage and maintenance at the roundhouse site. The primary areas of concern are as follows: 1) the southeast corner of the site in the 700 and 800 block of South Main Street where there were two manufacturing operations, one of which manufactured industrial gas appliances and the other manufactured industrial furnaces; 2) the center interior of the site where there were two manufacturing sites, one with an earth floor foundry and fertilizer storage and the other with a foundry, gas stove manufacturer and paint and varnish shed; and 3) at the west edge of the site under the Winnebago Street viaduct where the Chicago, Burlington and Quincy Railroad had a roundhouse operation.

c. Sites Ineligible for Funding

To the best of our knowledge, this Site is (a) not listed or proposed for listing on the NPL list, (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody or control of the United States government.

d. Sites Requiring a Property- Specific Determination.

Based on a review of the criteria in Appendix 2, Section 2.5, the City of Rockford Site does not require a Property Specific Determination.

e. CERCLA 107 Liability.

The City of Rockford is not potentially liable for contamination at this site under CERCLA 107 because the City of Rockford is not a current owner or operator or previous owner or operator of any of the parcels included in this site.

f. Enforcement Actions

The City of Rockford is not aware of any ongoing or anticipated environmental enforcement actions relating to this Brownfield Site.

g. Information on Liability and Defenses/ Protections Where Applicant does not own the Site

i) The City of Rockford has not arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site and the City of Rockford has not caused or contributed to any releases of hazardous substances at the site.

ii) There are multiple owners of this site, and most of the site is anticipated to be owned by four Railroad Companies. The City of Rockford has begun discussions with the Canadian National Railway because of building code violations for two structures on the CN property in the 700 and 800 block of South Main Street in the southeast part of this Site. In addition, the City demolished the structure at 522 Cedar Street because it had collapsed. This property is located in the northwest corner of the site. The City has placed a lien on this property but has not taken any steps to acquire the property. The City has not approached any of the other property owners concerning their property within this site, though the City is acquainted with some of these owners due to redevelopment projects in other parts of the City.

iii) The City will negotiate access to the 28 parcels comprising the Site on a parcel by parcel basis. The Canadian National R.R. appears to be willing to grant access to four parcels at this time.

h. Information on Liability and Defenses/ Protections Where Applicant Owns the Site or Will Own the Site During the Performance of the Grant

The City of Rockford does not own the site and does not currently have any pending negotiated purchases. The City will attempt to acquire portions of this 28 parcel site over time and will adhere to the ASTM E1527-05 Phase I process prior to acquisition of any parcel.

Ranking Criteria for Assessment Grants

1 Community Need

a. **Health, Welfare and Environment:** The City of Rockford, Illinois, was once a thriving manufacturing community, which has since faced decades of economic decline. Rockford was designated by the State of Illinois as an Enterprise Community in 1989; a designation based on poverty, unemployment, and economic growth factors. Prior to 2006, the City had created fourteen (14) Tax Increment Finance (TIF) districts in recognition of the area's continuing physical distress and economic decline. During 2006 through October of 2008, an additional ten (10) TIF Districts were created. Nine additional TIFs are currently being formed. During 2003, The Global Trade Park Industrial Recovery RPLA was created. Rockford qualified for this special redevelopment planning area designation because of unemployment above the state average. During 2005, the Harrison/ Kishwaukee RPLA was created in an area especially burdened with abandoned industrial properties in what had once been an industrial rail beltway. The South Main Rail yard Site is included in the South Rockford TIF created seven years ago. Since that time, however, this Site has experienced accelerated physical deterioration and continued building abandonment as several freight buildings, freight yards and reloading facilities are no longer being used at this Site. One freight building located at 522 Cedar Street collapsed earlier this year, requiring a \$60,000 emergency demolition by the City. Two structures in the 800 block of South Main Street are in the process of being condemned. These structures coupled with vacant and deteriorating storage facilities and junk-strewn lots together create an especially desolate three block stretch of South Main Street. Between Cedar Street and Kent Creek.

i) Effect of brownfields on the targeted community: This proposal is specific to the South Main Rail yard Site, a Brownfield site located in the most economically distressed neighborhood of Rockford, the Near West and Southwest Neighborhood. This Brownfield Assessment effort will compliment other

Brownfield Assessment and Cleanup efforts on the Southwest side of Rockford, including the South Main/Water Power District Targeted Area, immediately east of this Site, the nearby Barber Colman complex and Barber Colman Village North, centered on Morgan Street. In these nearby Targeted Brownfield areas, brownfields have a severe impact on adjacent neighborhoods. Once thriving areas with workers and retail serving these workers, these Brownfield sites now contribute to crime and deterioration of the surrounding neighborhoods and form physical barriers to normal social interaction. In many ways, Brownfields such as Barber Colman, Barber Colman Village North and especially the South Main Rail yards form physical and psychological barriers between adjacent neighborhoods to the south and west and the Downtown which lies north of these Brownfields. The South Main Rail yard Site is particularly foreboding to pedestrians who are never seen in the 600 through 800 Blocks of South Main Street on either side of the street or in the 1200 through 1400 blocks of South Main Street on the east side of the street in front of the vacant Barber Colman complex. Over time this area has experienced a major decline in population. The Near West and Southwest Neighborhood surrounding and including the South Main Rail yards Site, defined as Census Tracts 25 through 29, is the area with the most extensive concentration of Brownfields. The population in this area has declined from 22,093 in 1960 to 16,614 in 1980 and to only 14,418 in 2000. This area has 70 Acres of Brownfield sites on 81 parcels, according to the River Edge Application prepared by the City of Rockford. The South Main Rail yard Site accounts for 33 of these 70 Acres and 28 of the 81 parcels.

ii) Sensitive populations: Rockford is a diverse community with a minority population of 31.6% according to the 2000 Census. For the City as a whole, the African-American population is 17.2% of the total population, while the Hispanic or Latino population is 10.5 % of the total population. Also, 14% of the total population is living below the poverty level with 10.5% of families living below the poverty level in Rockford as a whole. Median household income was \$37,667. (US Census 2000)

The surrounding neighborhood of the South Main Rail Yard site is referred to as the Near West and Southwest Neighborhood and is comprised of Census Tracts 25, 26, 27, 28, and 29, and has a total population of 14,418. The area contained within these Census Tracts has a strong concentration of poverty, poor housing, and limited services. Collectively, this area has a minority population of over 75%, an African American population of 52.3%, a Hispanic or Latino population of 24.4%, and a persons living below the poverty level of 35.6%, over one third of the total population of this area. Nearly one third of all the families, 32.1%, are living below the poverty level. Median household income is roughly half that of the City as a whole, \$19,661. In addition to these sensitive population indicators, the Near West and Southwest Neighborhood has a high concentration of children under 10 years of age with 18.95% of the total population compared to 15.28% for the City as a whole. For children under 10, this figure is 33.4% compared to 26.66% for the City as a whole.

With recent TIF creation efforts, the entire Near West and Southwest Neighborhood area is now located within a TIF District.

b. Financial need

i) Economic Impact of Brownfields: The Environmental Assessment Program at the South Main Rail yard site will be very beneficial in the redevelopment of the very core of this neighborhood because the planned redevelopment of the South Main Rail Yard Site includes neighborhood retail and other general

services as well as an open space corridor connecting this site to the neighborhoods. These are major components of the first phase of the redevelopment proposal for the Rail Yards site, and the second phase would include Metra and Amtrak service and transit-oriented support development. Currently, there is only a single grocery store and no general merchandise store located within this five Census Tract area. Very few retail services or other basic services can be found within this area.

The 2000 Census reported unemployment for the City of Rockford at 4.7%. Average unemployment for 2005 was estimated at 8.1% for the City, but was 19.4% in the Near West and Southwest Neighborhood. Three of the included Census Tracts were over 20% unemployment for 2005. (Illinois Monthly Labor Force Report, Illinois Department of Employment Security). 2000 Census data also reveals that 22% of the City's population 18 and over never finished high school, while, in the Near West and Southwest Neighborhood the figure was 48.4 %.

ii) Funding and resource limitations: Although the City of Rockford has received four USEPA Brownfield Assessment Grants, the first three Grants, FY 2001, FY2004, and FY 2006 have been completely exhausted. The FY 2008 Assessment Grant is over 75% completed, with the remaining 25% committed for three Brownfield sites. The FY 2008 Assessment Grant is expected to be exhausted during the second quarter of FY 2009. Although the assessment work will have been completed at the Barber Colman sites and the Ingersoll sites by that time, these two sites only account for 20 acres of the 665 Brownfield Acres in the River Edge Zone, only a portion of the City. Within the Near West and Southwest Neighborhood, only 15 acres of the 70 acres of Brownfields have been assessed. The remaining 55 acres will require funding far beyond the Community Wide Assessment Program because of the extensive amount of Brownfields in the community as a whole as previously noted. This Site-Specific Assessment Grant for this sensitive area would be protected from being assigned a lower priority as may be the case for this site if it was included in the Community-Wide Assessment Program.

Some progress has been made at other targeted Brownfield sites, such as the West State Street Corridor where approximately 25% of the 47 Brownfield sites have had Phase I ESAs or Phase II ESAs performed and the Downtown where approximately 10% of the Brownfield sites have had Phase I or Phase II ESAs performed. Other than desktop reviews and/or eligibility determinations, however, the other Targeted Brownfield areas have had no environmental assessment work performed due to the exhaustion of the Assessment Grants.

The River Edge program of the State of Illinois provides Assessment and Cleanup funds to the City for City-owned Brownfields but only if the City is able to enter into an Agreement with a Developer to redevelop the site. Since the South Main Rail yard Site is located in such an economically distressed area, there is little chance of being able to use this program at the South Main Rail yards Site. There may be some interest in the River Edge program at other sites, but the City has found very limited interest by Developers in these Brownfield sites unless they have already been Assessed, Assembled and Cleaned up, thus placing the financial burden on the City, the City's TIF program and/or the USEPA Assessment and Cleanup Grant Programs. The City was recently successful in using TIF bonding to assess, clear and clean a City-owned Brownfield Site for the expansion of an adjacent industry. This is the Liebovich Steel expansion, and the TIF program coupled with job creation by Liebovich Steel led to this success. Many of our Brownfield Sites such as the South Main Rail yard Site, however, are sites that have not been assembled and do not have adjacent businesses or industries that are willing or likely to expand.

2. Project Description and Feasibility of Success

a. Project Description

The City of Rockford proposes to perform Phase I Environmental Site Assessments at a minimum of 25 of the parcels included in this site, with the intention of completing all of the parcels with this Grant. The City has negotiated with the Canadian National Railroad concerning four of their parcels within the site. This Grant would enable the environmental assessment of these four parcels. If negotiations continue as hoped. The City would acquire these parcels after the assessments are completed, demolish the two deteriorated structures located on these parcels and begin construction of the Davis–Pec Path connection

Phase II Environmental Site Assessments will be performed at a minimum of 5 parcels, to be targeted based on the results of the Phase I ESA results.

b. Budget for EPA Funding and Leveraging Other Resources

i) South Main Rail Yard Site: Assessment Grant Proposal Budget (Hazardous Substances)

Budget Categories	Task 1:	Task 2: Phase I ESAs	Task 3: Phase II ESAs	Task 4: Cleanup Planning/Site Remediation Program	Task 5: Community Involvement	Task 6: Programm atic Activities	TOTAL
Personnel							
Travel¹						\$ 5,000	\$ 5,000
Equipment²							
Supplies					\$ 3,000		\$ 3,000
Contractual³	\$ 5000	\$65,000	\$185,000	\$ 45,000	\$ 5,000		\$ 305,000
Other: IEPA SRP Fees				\$ 37,000			\$ 37,000
USEPA Grant Total	\$ 5000	\$ 65,000	\$185,000	\$ 82,000	\$ 8,000	\$ 5,000	\$ 350,000
City In-kind Match Total					\$ 8,500	\$ 9,000	\$ 17,500
Project Total	\$ 5,000	\$ 65,000	\$185,000	\$ 82,000	\$ 16,500	\$ 14,000	\$ 367,500

Task 1: Parcel Prioritization and Plan Implementation Coordination

The City will evaluate the potential for acquisition and redevelopment for each parcel and parcel grouping based at least in part on ownership, parcel configuration and success in implementing complimentary plans, such as the Rail Consolidation Plan, the Greenway Plan for the Davis Pec-Path connection and components of the South Main Street Redevelopment Concept Plan. The City's Brownfields Coordinator has been made Project Manager of the implementation of the Rail Consolidation Plan and all Brownfields Redevelopment Planning. Our intent is to utilize the funds in this task to prioritize the parcels on an ongoing basis, following the process described in Section C. Once parcels have been prioritized, the

eligibility determination information will be updated and resubmitted to USEPA if necessary. In the case of commingling of hazardous substances with petroleum, the same eligibility determination information will be submitted to the Illinois EPA.

Task 2: Conduct Phase I Site Assessments – Individual Sites

Once parcels and parcel groups are prioritized, eligibility determinations have been updated and accepted, then Phase I Environmental Site Assessment (ESA) will be conducted. All Phase I ESAs will be prepared in accordance with the ASTM E1527-05 standard, which has been approved by USEPA as demonstrating that All Appropriate Inquiry has been conducted as detailed in the November 1, 2005, 40 CFR 312, Standards and Practices for All Appropriate Inquires, Final Rule, which became effective November 1, 2006. The City anticipates conducting twenty-five to thirty-three Phase I assessments at an average cost of \$3,000 per site.

Task 3: Phase II Environmental Site Assessments

The City anticipates conducting five (5) to nine (9) Phase II ESAs based on the results of the Phase I ESAs. The number of assessments conducted will, in part, depend upon the size of the selected parcels and the nature and extent of the contamination involved. Three (3) items must be completed by our contracted Brownfields consultant prior to commencing with any Phase II ESA activities. First the contracted consultant must prepare and receive approval from EPA of a Quality Assurance Project Plan (QAPP), Health & Safety Plan (HASP), and Sampling and Analysis Plan (SAP). The Phase II ESAs will be compliant with Illinois EPA Site Remediation Program standards.

The sites where contamination is found will then be enrolled into the Illinois EPA Site Remediation Program (SRP). The SRP is a well tested and proven voluntary cleanup program. Our intent would be to prepare the enrollment application and take the results of the Phase II ESA work and present that information in the form of a Work Plan with the application. The Work Plan will detail the additional investigative activities that will be needed to define the lateral and vertical extent of the discovered contamination.

The costs of Phase II ESAs vary widely and tend to be more costly than petroleum only sites. Costs vary due to the size of the site and the contaminants being evaluated. As part the SRP, many hazardous substance sites are enrolled as a “Comprehensive” site which require analyzing for 122 compounds and results in significant laboratory costs compared to “Focused” sites. Overall Phase II ESA costs can range from \$15,000 to \$65,000 per site. We have found that sites investigated as “Comprehensive”, while expensive, best positions the site for redevelopment.

Task 4: Prepare Remedial Action Plans (Cleanup Plans)

Following the SRP enrollment (budgeted in this task) and the completion of the Site Investigation step as part of the SRP process, Remedial Objectives/Remedial Action Plans (ROR/RAP) will be prepared. We intend to prepare plans for the three (3) to five (5) Phase II ESA properties, based on the amount of funding remaining once we get to this step.

This task also includes paying for IEPA project management fees for regulatory review and approval of plans submitted to the IEPA for review under the SRP. The IEPA voluntary cleanup programs are fee-for-service programs. Since all sites for which Phase II ESAs are conducted will be enrolled in the IEPA

programs, oversight fees will accumulate beginning with the review of the proposed Phase II Assessment work plan.

Task 5: Community Involvement

The objective of this task is to inform the communities in the South Main Rail yard Brownfields Targeted Area of: a) the City's intent to conduct environmental assessment activities; b) community input concerning the priorities for assessment activities and future redevelopment; c) the assessment results; and d) cleanup plans and redevelopment efforts. The City intends to rely primarily upon the following Community Outreach efforts: 1) monthly Fifth Ward Meetings—this Site and the surrounding neighborhoods are located in the Fifth Ward (Alderman Victory Bell); 2) Planning and Development Committee Meetings of the City of Rockford, which are open to the public, published in all the media, and reported upon by the media; and 3) the City of Rockford Website, press releases, and legal notices in the local newspapers and 4) monthly coordination meetings with the City's 5 Brownfield Community Partner Organizations.

Grant funds will be used for the printing of handouts and fact sheets, public notices in the local newspaper, and presentation quality graphic displays to be used at the Ward meetings and other community-related meetings. Although not required under assessment grants, the City will utilize considerable in-kind staff time that will be above normal duties related to community involvement.

Task 6: Programmatic Activities

As part of the grant process, the City will utilize City staff to prepare all quarterly grant reports and the annual financial reports. We also intend to have City staff attend national and state Brownfields conferences and workshop. We intend to use grant funds to cover the travel expenses related to attending these conferences and workshops.

ii)Leveraging: The City of Rockford will make every effort to utilize the Illinois EPA River Edge Program to perform Cleanup at sites that have been assessed through the USEPA Assessment Grant Program. This will require the City to enter into Agreements with Developers on the basis of a Cleanup Plan and Draft No Further Remediation letter from Illinois EPA. This will be a serious challenge for the City, considering the low land values and land rents in this region, but the City will make every effort to tap into this resource. A total of \$1.7 Million has been set aside for the City of Rockford if the City can find Cooperative Development Partners.

In addition to River Edge, the City has used its TIF Bonding capability effectively in the redevelopment of two Brownfield sites. At the Reed-Chatwood Storage Site, TIF Bonding and a BEDI Grant were used to redevelop a corner of a Brownfield site for construction of new grocery store in 2003. IEPA Assessment Grant funds had been used for ESA work. This summer, the City of Rockford used its TIF Bonding Authority to leverage \$1.1 million to prepare a portion of the City Yards site for a \$10 million expansion of Liebovich Steel with an 80,000 square foot structure and creation of 10 jobs, initially. This is the first phase of a four phase expansion that will cost \$40 million and produce 40 jobs when complete. Liebovich Steel produces specialty steel components for building construction. Liebovich is landlocked on three sides and was faced with relocation if it could not expand south across Kent Creek into the City Yards property. The City Yards site had been a large J.I. Case manufacturing plant until approximately 1970. The TIF funds were used for assessment, drum removal, tank removal, demolition of several large structures, asbestos abatement, transformer removal and free product removal. Liebovich Steel will also

be investing approximately \$200,000 in the reconstruction of the Independence Avenue Bridge over Kent Creek. This bridge provides access to their expansion area.

c. Programmatic Capability

i) Previous USEPA Grants The Brownfields Coordinator, Wayne Dust, Planning Administrator for the City of Rockford, has 34 years of City Planning experience and has managed several USEPA Grants during the past six (6) years. During the summer of 2003, the USEPA Brownfields Pilot Grant was successfully closed out and confirmed by correspondence from USEPA. During the fall of 2003, the City of Rockford entered into a Cooperative Agreement with USEPA for two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2002-2003 grant cycle. Contracts were awarded to two (2) environmental consulting firms in January of 2004 and these assessment activities were completed during the spring of 2008 with numerous ESAs performed and all funds expended. Significant accomplishments of the 2004 Hazardous Substance Assessment Grant include: 1) partial completion of a Phase II ESA and Remedial Action Plan for the twelve (12) acre Barber Colman industrial complex, and 2) completion of a desktop Phase I for the fifty plus (50+) acre North and South Barber Colman Village Area. For the Petroleum Grant, Phase I ESAs were performed at 7 West State Street Corridor sites and 2 Downtown sites, including the four-block area which was later cleared and is occupied by the new County Justice Center. The Quarterly Reports were prepared by Mr. Dust, submitted to USEPA, and approved on a regular basis. The FY 2004 Assessment Grants had been extended to September 30, 2008 and will be closed out by December 31, 2008.

During the fall of 2005, the City of Rockford entered into a Cooperative Agreement with USEPA concerning two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2004-2005 grant cycle. Contracts were awarded to three (3) Environmental Consulting firms during February of 2006 and this Assessment Grant was completed in the summer of 2008, with all funds expended. Major additional Phase II ESA work was performed at the City-owned Barber Colman sites. Phase I and Phase II ESAs were completed for the City-owned former Ingersoll site, a 5 Acre site on the bank of the Rock River. This site was then enrolled in the IEPA Site Remediation Program. Phase I ESAs were also performed on Keith Creek Greenway sites prior to City acquisition. For the Petroleum Grant, several additional Phase I ESAs and one Phase II ESA were performed in the West State and Downtown areas. Quarterly reports have been submitted by Mr. Dust, and approved on an ongoing basis for these Grants. The FY 2006 Assessment Grants had been extended to September 30 of 2008 and will be closed out by December 31, 2008.

The City of Rockford received a \$400,000 Community Wide Assessment Grant for the FY 2008 period. This grant has been used to complete Phase II ESA work at the Barber Colman Complex (Hazardous Substances) and for Phase I and Phase II ESA work at several Downtown Sites. This Grant is now 75 % completed and the remaining \$100,000 in this grant is committed to three sites. Three Cleanup Grants were received in 2008, and Asbestos Removal contracts have been awarded to implement a portion of this Grant.

The City of Rockford also received a Brownfields Revolving Loan Fund Award of \$500,000 in 2000. Under Mr. Dust's supervision, this Revolving Loan was used to Cleanup the Invensys Metal Plating site at Barber Colman, during 2005, to be used as a future section of the Riverfront Greenway along the Rock River. The Revolving Loan Fund Grant has been completed, with all funds expended, and closed out. This was confirmed by correspondence from USEPA. The City is taking steps to revolve these funds

through legal action against the former property owner. In addition, two (2) Illinois EPA Assessment Grants totaling 240,000 were awarded, completed, and closed out during the 2001 through 2004 time period. These assessment efforts, together with the City's acquisition and clearing of a mixed industrial and commercial site, culminated in the receipt of the No Further Remediation letter from the Illinois EPA for the five (5) acre site acquired by the City of Rockford for the New Federal Courthouse, an \$80 million construction project which is now under construction by US General Services Administration.

There was only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by Mc Gladrey and Pullen for 2005. Finding 2005-7 stated that..."the City is required to submit quarterly reports to the U.S. EPA within 30 days after the end of each quarter that details expenditures and other activities under the programs, as well as progress being made at the clean-up sites. We noted that out of eight quarterly reports that should have been filed for the year ended December 31, 2005, six of the reports were late... The Cause stated "Delays in submitting the quarterly reports have been due to delays in receiving billings from the five Environmental Consulting firms under contract to perform the environmental work for the City. Section 2.2 of the required quarterly report by USEPA requires documentation of the "Funds Expended" during the reporting period". The Management's Response by the City stated... " If necessary, we are prepared to send an incomplete report to meet the USEPA Cooperative Agreement deadline to be followed by a final report when we have received all of the information". It should be noted that all quarterly reports due starting July 30 2006 through the present have been submitted on time with the exception of two reports submitted only one day late.

During the past six years, the Rockford Brownfields Coordinator has made every effort to comply with the Cooperative Agreement and quarterly progress report requirements for the Assessment Grants, BCRLF and, more recently, the three (3) Cleanup Grants. The Brownfield Pilot Grant and the current Assessment Grants have been instrumental in preparing two (2) sites for major governmental facility construction projects. Assessment Grants have been used to perform Phase I and Phase II ESAs Environmental Assessments at the City-owned Barber Colman complex in preparation of this site for a possible Youth Sports Center. Letters of No Further Remediation have been received on a portion of the area comprising approximately one-third of the site. In addition to the proposed youth sports complex, it is the City's intent to provide housing, riverfront open space, educational opportunities, and additional retail activity at this site following cleanup.

3. Community Engagement and Partnerships

a) Plan for involving the affected community: Rockford understands the importance of involving the community in Brownfield redevelopment. The City of Rockford has been actively involved in the community in its Brownfield initiatives. Wayne Dust, local Brownfield Coordinator and Planning Administrator for the City of Rockford, has presented an overview of the City's intent to apply for USEPA Brownfield Assessment and Cleanup Grants at several of Alderman Victory Bell's Fifth Ward meetings at the Montague Branch Library. An initial presentation was made at the June 26, 2008 Fifth Ward Meeting and a more detailed presentation was made at the September 25, 2008 Meeting. He provided a status report on current environmental assessment activities as well as identifying the City's intent to apply for Assessment and Cleanup Grants and perform environmental assessments at additional locations within the Fifth Ward. It is important to note that the Public Hearing for the asbestos removal at the Rock Street Frontage, River Street Frontage and Machine Shop Sites at the Barber Colman Complex was held at the Montague Branch Library on April 24, 2008 and Alderman Bell's Monthly Fifth Ward Meeting immediately followed the close of the public hearing. The people of the Fifth Ward have been

kept well informed over the past several years of the City's efforts to redevelop numerous Brownfield sites and have been very supportive of the City's efforts. The South Main Street Rail yard site proposed for this grant is located in the Fifth Ward. Mr. Dust will continue to provide status reports and seek input from the community at these Fifth Ward Meetings

Stakeholders meetings were held concerning the South Main Rail Yard area during December of 2007. This was a major component of the development of the South Main Street Redevelopment Plan Concepts by Vandewalle and Associates. In addition, the Brownfields Coordinator will continue to inform Alderman Bell concerning all of the Brownfields Programs in the Fifth Ward including the Rail Yard area and will formally request Aldermen Bell to schedule the Brownfields Coordinator on all Ward meeting agendas. Input provided by the Community and Alderman Bell will be a major consideration in the development of the Work Program and Brownfield site selection later in the process.

b) Identification and establishment of state and local partners: Although the City of Rockford had been awarded two Illinois EPA (IEPA) Brownfield Assessment Grants some time ago, the recent designation of the City of Rockford River Edge Zone has created a major new opportunity to partner with IEPA on redevelopment projects on Brownfields sites requiring cleanups. The IEPA funds are severely restricted and do not include cleanup other than soil and groundwater. Combined with USEPA programs, however, the City will strive to tap into this valuable resource to accomplish the redevelopment of the South Main Street Rail yards site. Mr. Dust has met with Mr. Doug Scott, IEPA Director concerning the River Edge program and its potential use at redevelopment sites.

The City is actively developing partnerships for redevelopment projects at the local, state, and federal levels. The City developed a Master Plan with the assistance of the Rockford Local Development Corporation (RLDC) for the Barber Colman Village area and is continuing discussions with potential developers. Working with the RLDC, a portion of the former Barber Colman facility was redeveloped, following assessment and cleanup, as a new grocery store, serving the surrounding area. Also the City has partnered with Winnebago County and the U.S. General Service Administration for the development of the Winnebago County Justice Center and the Federal Courthouse. Following assessment and cleanup activities, construction on the \$100 million dollar Winnebago County Criminal Justice Center was completed in July of 2007. The Federal Courthouse is now under construction and is expected to be at least an \$80 million project when completed late in 2009.

The City plans to develop additional partnerships to successfully accomplish sustainable development at the South Main Rail yard site. The City has been negotiating with one of the four Rail Road Companies in this area concerning the establishment of the Davis Pec path from South Main Street to the west on an easement to be created on the Rail Road property. Successful redevelopment efforts at this site will also require the continued partnership with the Rockford Park District because long-standing importance and desire to implement the Davis-Pec Connection as a major component of the Greenways Plan and Grand Illinois Trail System. Also, the River District Association is actively involved in promoting the successful redevelopment of all the South Main Rail yard area because of the positive impact on the Downtown and the South Main Street Gateway from the South if this site is successfully redeveloped.

The USEPA could be a possible partner at this site for time critical removal actions similar to the Sparkle Cleaners site in Rockford during February of 2008

c) Description of and role of the key community-based organizations

i) **The River District Association** is a private, 501 (c) 3 not-for-profit membership based organization with over 500 members. The Association's mission is to promote a growing, thriving, prosperous business and residential community in Rockford's Downtown neighborhood, the River District. The River District's South Boundary coincides with the South Main Rail yards North boundary. The River District Board and Executive Director have met monthly with the City Administration and Community and Economic Development Department Staff including the City's Brownfield Coordinator, Wayne Dust, concerning Downtown Redevelopment. selection and prioritization of Brownfield sites. Brownfield initiatives at important Downtown and nearby sites, especially the South Main Rail yard site, have been priority items on these monthly agendas. The representative from the River District is Kim Wheeler, Executive Director. Ms. Wheeler may be reached at 815.964.6221.

ii) **The Rockford Local Development Corporation (RLDC)** is a not-for-profit certified development company, by the Small Business Administration, that strives to be a champion for small business and economic development. RLDC has frequently partnered with the City, including the development of the Gray's IGA Store on South Main Street on a former Brownfield site and the Brownfields Cleanup at the former Invensys site. The RLDC recently partnered with the City of Rockford in the redevelopment of a portion of the Reed-Chatwood Storage Site for additional development of a medical clinic and general merchandise store. RLDC has also partnered with the City in the City's program to relocate families from the flood impacted Keith Creek floodway, an area where over 100 homes were severely damaged by two severe floods in less than one year's time. Mr. John Phelps is the Executive Director of the RLDC. His contact information is 815.987.8675

iii) **Southwest Ideas for Today and Tomorrow (SWIFTT)** is a membership based non-profit economic and community development organization working to attract and retain businesses and services to improve the quality of life for people who live and work in Southwest Rockford. Nelson Richards is the Executive Director and he regularly attends Alderman Victory Bell's Monthly Fifth Ward Meetings to provide input and coordinate with the City. The SWIFTT office is located at 1005 South Main Street, only one block south of the South Main Rail yards site. Mr. Richards's phone number is 815.965.3606.

iv) **Comprehensive Community Solutions, Inc. (CCS)** is a not-for-profit agency that provides job training, builds affordable housing and works to redevelop economically distressed neighborhoods in the City, including near the West State Street Corridor. The CCS Youth Build program allows troubled youths the opportunity to develop their vocational skills on redevelopment projects. CCS has partnered with the City on several community development projects in several areas of the City. The CCS Headquarters is located at 907-917 S. Main Street, immediately adjacent to the South Main Rail yards Site.

The Executive Director/ CEO is Kerry Knodle, 815.963.6236.

v) **Rockford Area Economic Development Council (RAEDC)** as the regional economic development council, partners with the City of Rockford and the other local governments in this region in its primary role, "to help employers retain and create quality jobs". This partnership fits well with the RAEDC's four public policy priorities, especially the priority of a "Coordinated Regional Economic Development Plan", a plan that results in the area being prepared for economic development. The RAEDC can help the City redevelop its Brownfield sites when they have been prepared for redevelopment. City staff of the

Community and Economic Development Department meets weekly to review current issues and opportunities. The Brownfields Coordinator is included in specific meetings for certain Brownfield - related issues. Ms. Janyce Fadden is the President of the RAEDC and her contact number is 815.987.8118

In addition to the community organization listed above, the City of Rockford frequently partners with the Rockford Park District for the development of Greenways and pathways on Brownfield sites. As noted previously, the South Main Rail yards site contains the corridor for the Davis–Pec Path connection. This connection will connect to the Pecatonica Prairie Path to the west and the Bicentennial Bike path to the north and east. The Rockford Park District is a separate regional taxing district with an elected governing board. The Director of the Rockford Park District is Tim Dimke, 815.987.8800.

4) Project Benefits

a) Welfare and Public Health: The South Main Street Redevelopment Concept Plan was prepared specifically for the South Main Street Rail yard Site by Vandewalle and Associates (Madison, Wisconsin). This Plan as well as earlier, more general plans for the area all incorporate the City of Rockford's, the Rockford Metropolitan Planning Organization's (RMAP) and the Rockford Park District's plans for a continuous system of Greenways and Pathways along the both sides of the Rock River which links with the major regional pathway system especially the Grand Illinois Trail. The South Main Street Rail yards Site has a redevelopment plan that include job creation and major commercial office and retail developments along South Main Street in the initial phase. These developments would link with Downtown and encourage walking, non-motorized transportation, and in bad weather, public transportation, as the primary means of transportation to work or for recreation. South Main Street is a Rockford Mass Transit District bus route. In the longer term, this Site will have a Metra Station and surrounding Transit Oriented Development in the interior of the site and be linked to South Main Street with pedestrian facilities as well as transit service. An Amtrak station is also planned at the southern edge of the site. This focus on two major development nodes that encourage non- motorized transportation as part of this lifestyle is an important means of preventing pollution and promoting personal health. Implementation of the Davis Pec connection from east to west through the South Main Rail yards site is a critical link in the Regional system. This connection to the Pecatonica Prairie Path will give easy access to this 20 mile long pathway that utilizes the railroad grade from Rockford to Freeport, Ill. that had been abandoned by the Chicago and Northwestern R.R. around 1970. Other greenway priorities that will accompany the east to west connection from S. Main Street is the connecting path across South Main Street and north to Davis Park in Downtown and South to 15th Avenue along Kent Creek and the Rock River. In addition, the Greenways Plan includes converting one of the three (3) railroad trestles across the Rock River to a pedestrian bridge linking the recreation paths on either side of the river with the Davis –Pec connection to the west.

b) Economic Benefits and/or Green space

i) Economic Benefits: This important goal will be accomplished by the two main phases of this plan. The first phase, after properties have been assessed, assembled, cleaned and prepared for redevelopment, a development partnership would provide approximately 100,000 square feet of retail space in the 800 block of South Main Street. The Davis–Pec path would connect through this development to neighborhoods to the west and south along the scenic Kent Creek, which has already been partially reclaimed to the west of South Main Street. This new retail area would have transit service as well as the pathway connections. It is also close enough to the Hispanic Commercial area immediately south that they

would be visually connected and accessible to one another. A continuation of this first phase would result in commercial and office development continuing north and connecting with Downtown. A New Urbanism development design is planned, with “walkable” being the key design component. The second distinct phase of this redevelopment plan is the establishment of a Metra Station and Metra Service on the northern part of the interior of the Site, with a surrounding Transit Oriented Development that would include offices, retail and possibly residential. This development would be connected to Downtown to the north with a street and pedestrian facilities and to South Main Street with similar transportation facilities

Without the City’s concern for the redevelopment of Brownfields within the Rock River Corridor and the USEPA programs to assist with these redevelopment efforts, there is considerable evidence that Brownfield Areas would simply expand and intensify over time as more and more industrial buildings approach the end of their useful life. Instead, many buildings along the Rock River Corridor have been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of these areas. Similar comprehensive plans are in place or being developed at the two Targeted Brownfield Areas in proximity to the South Main Rail yards Site that would compliment and help sustain the redevelopment of an area that is now a barrier to interaction. All these plans include adaptive reuse or redevelopment of these areas to replace Brownfield properties with residences, retailers, offices, and public destination points, all of which contribute to the tax base as these areas are revitalized. The South Main Street/Water Power District Target Area, for example to the immediate east will provide the north-south greenway/ pathway connection and has a strong potential for mixed use redevelopment including residential especially if this portion of Kent Creek is reclaimed from the industrial uses that have flanked the creek for over 100 years. Each area’s redevelopment plan includes retail services for the surrounding community and job creation. Prevention of Brownfields and preventing existing Brownfields from expanding or intensifying is extremely important to surrounding neighborhoods, which, as demonstrated in Section 1, are already economically disadvantaged.

ii) Other non-economic benefits for sites to be used for green space The City’s primary non-economic benefit goal within the South Main Rail yards site is to provide adaptive reuse and/or redevelopment of these areas to include a major public open space component consistent with the Rockford Park District’s Greenway Plan for a continuous recreational path greenway corridor along both sides of the Rock River with city parks, boat launches and other major facilities at various points within the system and designed to compliment the City’s redevelopment efforts. This goal is integrated with the economic development goals because public access to the riverfront and to Kent Creek will be restored even though adjacent property will be restored to private ownership and the tax base. The restoration of public access benefits the desirability of the area as a place to live work and play.

The South Main Rail yard includes privately-owned properties where there has been general cooperation with the City. These properties will provide the starting point for the redevelopment efforts which will expand to encompass the entire site area over time. The South Main Rail Yard Site has major potential for open space development. The Davis–Pec Path connection would be accompanied by scenic parks with views of the Kent Creek bluff and the Tinker Swiss Cottage, a public museum and park, on the top of this Bluff. Public fishing and picnic areas would be provided along this section of Kent Creek. These open space amenities would compliment the retail development that would take place along South Main Street. In the longer term there will be increased recreational activity and increased tourism activity, due to restaurants and other retailers as well as additional landscaped public open space and pathway connections. Rockford is committed to including Green space and open space in urban redevelopment strategies for all Brownfields sites. The 2020 Plan for Rockford places an emphasis on smart growth techniques, which includes making a commitment to preserving the Green space that is available to the

City and preventing the consumption of land on the City's fringe. Restoring and protecting the Rock River Corridor and its major tributaries, such as Kent Creek, also provides a major amenity to the redevelopment taking place in these same Brownfield areas.

c) Environmental Benefits from Infrastructure Reuse/ Sustainable Reuse. Each of these important goals will be incorporated into our redevelopment efforts with the Rockford Park District. A major component of the infrastructure reuse will be the improved public access to Kent Creek. Native landscaping will be restored as the Davis- Pec Path Connection paralleling Kent Creek is completed.

d) Plan for Tracking and Measuring Progress We understand the importance of identifying the outcomes and outputs for our Brownfields Program. Agencies that award federal grants funds require the reporting of these outcomes and outputs to help justify the use of their funds and to secure the future of their funding programs. We will demonstrate to U.S. EPA the important outcomes and outputs of our Brownfield Project by regularly updating the ACRES System for each site that is targeted for assessment. We will specifically identify the following:

Outcomes of Assessment Grant Funding:

- Acreage of land in which environmental threats have been characterized
- Acreage of land positioned for reuse
- Jobs leveraged
- Funding leveraged
- Acreage of green space created or preserved

Outputs of Assessment Grant Funding:

- Phase I Environmental Site Assessments at NUMBER (X) to NUMBER (X) sites
- Phase II Environmental Site Assessments at X to X (X-X) sites (will vary depending on outcome of Phase I ESAs). Phase II Environmental Site Assessments will sample for the Illinois EPA Target Compound List (TCL) that includes volatile organic compounds, semi-volatile organic compounds, metals, pesticides, and PCB's all to position the site for enrollment in the SRP if contamination is discovered. While the TCL laboratory work is expensive, it allows a site to be enrolled into the SRP as a "Comprehensive" site.
- Enrollment of X (X) to X (X) sites into the Illinois Environmental Protection Agency's SRP as "Comprehensive" sites, providing the greatest degree of protection with the final No Further Remediation (NFR) letter received at the end of the SRP process.